

# **EXHIBIT 36**

**IN THE CIRCUIT COURT OF MARYLAND FOR BALTIMORE CITY**

IBN WILLIAMS

\*

*Plaintiff,*

\*

Case No.: 24-C-22-004662

v.

\*

COPPIN STATE UNIVERSITY, et. al.

\*

*Defendants.*

\*

\* \* \* \* \*

**DEFENDANT'S ANSWER TO AMENDED COMPLAINT**

NOW COMES Defendant, Lucian Brownlee (hereinafter, "Defendant"), by and through his attorneys Tiffani S. Collins, Esq. and Collins Legal Group, LLC, and hereby files this Defendant's Answer to Amended Complaint and in support thereof states:

**GENERAL DENIAL**

Defendant Lucian Brownlee generally denies all allegations in Complaint in this matter in accordance with Maryland Rule 2-323(d).

**FIRST AFFIRMATIVE DEFENSE**

Plaintiff fails to state a claim upon which relief can be granted.

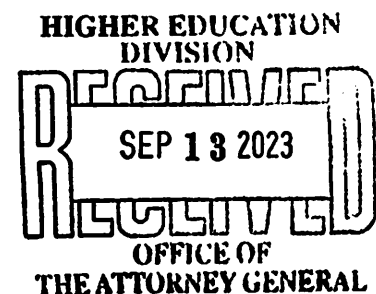
**SECOND AFFIRMATIVE DEFENSE**

Plaintiff claims are barred by laches and the applicable statute of limitations.

**THIRD AFFIRMATIVE DEFENSE**

If Plaintiff suffered the damages alleged, which fact Defendant expressly denies, then such damages resulted from other and further reasons for which Defendant is not responsible.

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**FOURTH AFFIRMATIVE DEFENSE**

If Plaintiff suffered the damages alleged, which fact Defendant expressly denies, then such damages resulted from pre-existing or subsequent events or conditions for which Defendant is not responsible.

**FIFTH AFFIRMATIVE DEFENSE**

If Plaintiff suffered the damages alleged, which fact Defendant expressly denies, Plaintiff exacerbated rather than mitigated his damages.

**SIXTH AFFIRMATIVE DEFENSE**

Defendant reserves all additional factual and legal defenses as may become available during discovery or trial.

**WHEREFORE**, Defendant request this Court to deny Plaintiff's request to enter judgment against Defendants, jointly, severally and/or in the alternative, for damages, interest, costs of suit, attorney's fees, enhanced attorney's fees, in an amount greater than the required jurisdictional limit, and such other relief as the Court deems joint and equitable.

Respectfully Submitted,  
 COLLINS LEGAL GROUP, LLC



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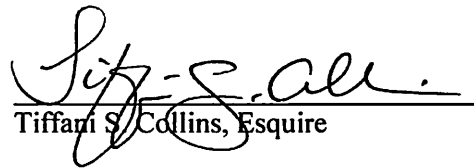
**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 7<sup>th</sup> day of September 2023, a copy of the foregoing Plaintiff's Answer to Amended Complaint was served via Electronic Mail and first-class Mail postage prepaid to:

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